

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
HEIDI A. OJEDA
3 Assistant Federal Public Defender
Nevada State Bar No. 12223
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Heidi_Ojeda@fd.org

7 Attorney for Jacqueline Chorney

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JACQUELINE CHORNEY,

15 Defendant.

Case No. 2:16-mj-283-VCF

**STIPULATION TO SET CHANGE
OF PLEA HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Patrick Burns, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.
20 Ojeda, Assistant Federal Public Defender, counsel for Jacqueline Chorney, that a Change of
21 Plea hearing be set to a date and time convenient to the court but no later than August 6, 2016.

22 This Stipulation is entered into for the following reasons:

- 23 1. On April 25, 2016, Ms. Chorney made her initial appearance on the Complaint.
24 At that time, the Court ordered her release on conditions including pretrial supervision.
25 2. The bench trial in this matter is currently set for September 14, 2016 at 9 a.m.
26

1 3. The parties have resolved this case through plea negotiation to include a
2 recommendation that Ms. Chorney be referred to Probation for the preparation of a PSR and an
3 agreement to recommend 3 years of supervised probation.

4 4. Ms. Chorney's lease expires on August 6, 2016. At that time, Ms. Chorney is
5 planning on moving to Arizona. She is planning on living with her friend, and she has lined up
6 employment in Arizona as well. Defense counsel is in contact with Pretrial Services about
7 verifying her residence and facilitating the transfer of her Pretrial Services supervision to
8 Arizona. Pretrial Services does not see any issue with her supervision being transferred.

9 5. The parties therefore request that the Court advance Ms. Chorney's change of
10 plea hearing to a time and date before August 6, 2016, so Ms. Chorney can attend court prior
11 to moving to Arizona.

12 This is the first request to set a Change of Plea hearing filed herein.

13 DATED this 20th day of July, 2016.

14
15 RENE L. VALLADARES
16 Federal Public Defender

 DANIEL G. BOGDEN
 United States Attorney

17 /s/ Heidi A. Ojeda
18 By _____
19 HEIDI A. OJEDA
 Assistant Federal Public Defender

 /s/ Patrick Burns
 By _____
 PATRICK BURNS
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JACQUELINE CHORNEY,

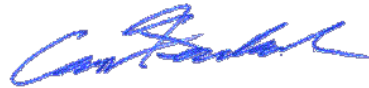
7 Defendant.

Case No. 2:16-mj-283-VCF

ORDER

9
10 IT IS FURTHER ORDERED that a Change of Plea hearing has been set for
11 August 3, _____, 2016, at 3:00 p.m.

12 DATED this 20th of July, 2016.

13
14 

15 UNITED STATES MAGISTRATE JUDGE